UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

MARIA ALEJANDRA CELIMEN SAVINO)	
and JULIO CESAR MEDEIROS NEVES,)	
)	
Petitioners-Plaintiffs,)	
)	20-cv-10617 WGY
v.)	
)	
THOMAS HODGSON, et al.,)	
)	
Respondents-Defendants.)	
)	

DEFENDANTS' MOTION FOR LEAVE TO REPLY

Respondents-Defendants hereby move for leave to reply to Plaintiffs' Opposition to Defendants' Motion to Revoke Bail. As grounds herefor, Plaintiffs allege in their Opposition that released class members have received inaccurate and inconsistent instructions regarding their conditions of release. Defendants seek the opportunity to inquire as to those interacting from ERO and/or its contractors regarding this issue. The Court ought to know if these allegations by Plaintiffs are accurate. Of course, as Plaintiffs acknowledge, none of this goes to the 14-day quarantine period, as to which the Court's and ICE's instructions were indisputably clear.

Defendants seek the Court's permission to file a reply by close of business on Thursday, June 11, 2020 and request a hearing on the Motion to Revoke on Friday, June 12, 2020.

Respectfully submitted,

ANDREW E. LELLING, United States Attorney

By: <u>/s/ Thomas E. Kanwit</u> Thomas E. Kanwit

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June 8, 2020

CERTIFICATE OF SERVICE AND OF CONFERRING PURSUANT TO L.R. 7.1

I hereby certify that I have conferred with opposing counsel and been unable to resolve the matter presented herein. I further certify this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Thomas E. Kanwit
Thomas E. Kanwit

Dated: June 8, 2020